



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. Park: Arkansas Post National Memorial

2. Project Description:

Project Name: Routine Maintenance to Non-historic Structures, Grounds, and Utilities

Prepared by: Kirby McCallie **Date Prepared:** 05/04/2020 **Telephone:** 870.548.2210

PEPC Project Number: 87264

Locations:

County, State: Arkansas, AR

County, State: Arkansas, AR **District, Section:** 01,

Describe project:

The Resource Management (RM) and Maintenance Divisions (Maintenance) of the National Park Service (NPS) Arkansas Post National Memorial (ARPO, the park) have identified a wide range of necessary routine maintenance actions. These actions will have no adverse effect on properties individually listed in or eligible for the National Register of Historic Places (NRHP), no adverse effect on historic districts and cultural landscapes, and no impact to any other significant environmental amenity. These actions, when coupled with the attached environmental commitments and NPS best practices, will have no significant impact to cultural or natural resources, and will enhance the cultural and natural environment of the park (Document and Attachments A-C). Routine maintenance is distinguished from project work by its cyclic nature, and limits in scope, duration and intensity; all project work will be developed through the standard NPS environmental process outlined below. This programmatic categorical exclusion document (PCE) will serve as a formal record of these types of actions for the routine operation and maintenance of buildings, utilities and grounds in the park for the years 2020-2025.

The purpose of this document is to reduce uncertainties and provide increased clarification regarding the National Environmental Policy Act (NEPA) and Section 106 compliance responsibilities of the park staff for routine maintenance and repair actions. This will allow park staff to complete the designated actions in a timely manner and allow park staff to focus scarce resources on projects that, if not completed, would have environmental consequences. The actions covered by this PCE are necessary to ensure visitor and employee health and safety, reduce the potential for environmental degradation, maintain park aesthetics, reduce costs, increase staff productivity and prevent deterioration of existing facilities. These routine actions are also necessary to maintain and/or improve the current condition of existing facilities, utilities, infrastructure and other park assets. Perhaps most importantly, the actions are necessary to ensure non-impairment of the park's cultural and natural resources.

The Maintenance Operations Supervisor and Park NEPA and Section 106 Coordinator will maintain a list of all actions performed under this PCE and provide consistent project information (Name, Location, Division/Partner, PMIS/FMSS reference, Description) as an attachment to the environmental document in the NPS Planning, Environment, and Public Comment (PEPC) system prior to the beginning of a project. The Maintenance Operations Supervisor will incorporate Facilities Management Software System (FMSS) and Project Management Information System (PMIS) data into the PEPC documentation as appropriate. The park NEPA and Section 106 Coordinator will review the projects at the time of their submission to confirm the applicability of the PCE to the proposed work. The ARPO RM and Maintenance Division Chiefs and the ARPO Cultural Resource Management (CRM) team will review the list of projects processed under this PCE annually to ensure program compliance with its terms, consistency of its application and determine whether the documentation should be changed or amended.

All actions performed under this PCE must apply the techniques, protocols, and methodologies described above. If new techniques or significant changes in the scope of work are proposed, the project leader will consult with the NEPA and

Section 106 Coordinator to request an amendment to the PCE to cover the proposed changes. ARPO's established interdisciplinary team (IDT) and CRM teams will review any proposed changes or amendments as warranted to assure that such amendments are within the scope and the spirit of this PCE. The standard for determining a significant change is based on the potential for increasing environmental impacts as determined by the NEPA Environmental Screening Form (ESF).

Area of potential effects (as defined in 36 CFR 800.16[d])

This PCE covers specific NPS actions within ARPO legislative boundary, which encompasses 749 acres in the Mississippi-Arkansas Rivers Delta. The Osotouy Unit (360 ac) is approximately 5 miles from the Memorial Unit (360) by air or 30 miles by paved and unpaved roads.

3. Has the area of potential effects been surveyed to identify historic properties?

☐ No
☒ Yes

Source or reference:

4. Potentially Affected Resource(s):

Archeological Resources Present: Yes

Archeological Resources Notes: Any project involving ground disturbance is excluded from this PCE and must be evaluated in a separate PEPC package in consultation with the park IDT team, CRM team, Arkansas Archeological Survey, Affiliated Tribes, and the Arkansas State Historic Preservation Office.

Historical Structures/Resources Present: Yes

Historical Structures/Resources Notes: This PCE is intended to cover a wide range of routine actions that will have no adverse effect on properties individually listed in or determined eligible for inclusion in the NRHP, (hereafter "historic properties") and no significant impact on any environmental amenities. Historic properties can include historic buildings, structures, objects, sites, districts and cultural landscapes. This PCE is also intended to cover the interior and exterior of modern park structures and objects that are located within, but are non-contributing elements to, historic districts and landscapes. Projects involving historic buildings, the exterior of non-historic buildings and any contributing elements within historic districts or inventoried cultural landscapes will be evaluated on a case-by-case basis in accordance with the Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation and the National Council of State Historic Preservation Officers (Section 106 PA). All activities covered by this PCE meet the criteria for Streamlined Review under the Section 106 PA

Cultural Landscapes Present: Yes

Cultural Landscapes Notes: This PCE is also intended to cover the interior and exterior of modern park structures and objects that are located within, but are non-contributing elements to, historic districts and landscapes

Ethnographic Resources Present: Yes

Ethnographic Resources Notes: In the event that prehistoric or historic Native American human remains or associated items of cultural significance are discovered in an undertaking, park staff will immediately stop work in the area and make a reasonable effort to protect the human remains and other cultural items. The person who makes the discovery will immediately notify the park NEPA and Section 106 Coordinator and the Superintendent, who will notify MWRO NAGPRA at the earliest possible time. The park Superintendent will take immediate steps, if necessary, to further secure and protect the

human remains and other cultural items. In the unlikely event that human remains are discovered, provisions outlined in the Native American Graves Protection and Repatriation Act (NAGPRA, 1990) will be followed.

5. The proposed action will: (check as many as apply)

- ☐ No Destroy, remove, or alter features/elements from a historic structure
- ☐ No Replace historic features/elements in kind
- ☐ No Add non-historic features/elements to a historic structure
- ☐ No Alter or remove features/elements of a historic setting or environment (inc. terrain)
- ☐ No Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape
- ☐ No Disturb, destroy, or make archeological resources inaccessible
- ☐ No Disturb, destroy, or make ethnographic resources inaccessible
- ☐ No Potentially affect presently unidentified cultural resources
- ☐ No Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources
- ☐ No Involve a real property transaction (exchange, sale, or lease of land or structures)
- ☐ Other (please specify): _____

6. Supporting Study Data:

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

Each year, the NPS presents the annual report of all undertakings reviewed using the Streamlined Section 106 review process to the Arkansas State Historic Preservation Officer (SHPO), and all undertakings approved under this PCE will therefore be subject to SHPO oversight. As part of this annual review, the park's NEPA and National Historic Preservation Act (NHPA) compliance coordinator (NEPA and Section 106 Coordinator), ARPO Cultural Resource Management (CRM) team, and NPS Midwest Regional Section 106 Coordinator will review all actions performed under this environmental document to ensure that they conform to the streamlined criteria, and submit their review comments to SHPO in the annual report. Any actions found not to meet the streamlined criteria will be exempt from this PCE and will be processed through standard consultation with SHPO as is required under terms of the Section 106 PA and NPS policy and procedure. Further, maintenance staff will adhere to the Secretary of the Interiors Standards for Rehabilitation (36 CFR 67) in the treatment of all historic properties (Attachment D). Any work not able to be achieved using the Section 106 PA will be evaluated under a separate and individual NEPA and NHPA process

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

[X] 106 Advisor

Name: Kirby McCallie

Date: 05/04/2020

Comments: Update 3/17: provided requested information to Rachael on 3/09/20.

Update 3/31: DOE for each building is pending

Update 5/4: Per conversation with Regional 106 Coordinator, project converted to PCE to include all streamlined routine maintenance & repair to non-historic buildings, grounds, & utilities.

Check if project does not involve ground disturbance [X]

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations: Any new construction, ground disturbance or expansion of the existing building footprint must be evaluated in a separate PEPC packet. All activities must be reviewed annually to ensure compliance with the PCE. Any action falling outside the scope of the PCE must be evaluated in a separate PEPC project in consultation with the park IDT team, CRM team, Arkansas Archeological Survey, Affiliated Tribes, and the Arkansas State Historic Preservation Office.

Doc Method: Streamlined Review (PA)

Streamlined Activity:

2. Rehabilitation and/or Minor Relocation of Existing Trails, Walks, Paths, and Sidewalks
 5. Routine Grounds Maintenance
 9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences
 14. Mechanical, Electrical and Plumbing Systems
-

[X] Archeologist

Name: Dawn Bringelson

Date: 03/09/2020

Comments: This project appears to apply to maintenance, cleaning of non-historic structures, so archeological impact is not anticipated. Project mentions no ground disturbance.

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☐ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

Recommendations for conditions or stipulations: Any projects involving potential disturbance on surface deposits should be addressed in separate PEPC statements. Need more detail to determine appropriate Streamlined review activity.

[X] Curator

Name: Heather Young

Date: 03/09/2020

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☐ No Adverse Effect ☐ Adverse Effect ☐ Streamlined Review

Recommendations for conditions or stipulations: The project has no potential to affect museum collections.

[X] Historian

Name: Rachel Franklin Weekley

Date: 04/18/2020

Comments: Thank you for providing additional information.

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Streamlined Review (PA)

Streamlined Activity:

1. Preservation Maintenance and Repair of Historic Properties
-

[X] Historical Architect

Name: William Harlow

Date: 03/09/2020

Comments: Needs to be some mechanism for review, assessment & feedback that this is working. This makes sense for maintenance that is 1) corrective 2) condition based 3) preventative 4) predetermined/warranty and 5) predictive. Capitol improvements and betterment may make sense too but all in the context of a maintenance plan that has some accountability and time limit.

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations: The entire property is on the National Register of Historic Places and contributing resources have been identified and there is some related character to the setting at areas. The vast majority of maintenance activities would be expected to have no adverse effect on ARPO. Revised recommendation 4/12/2020 No adverse as revised description of actions and activities focused on cleaning, maintenance, repairs and finished surface renewal that would be expected to be funded largely from the park's operational budget. This action should have a future sunset date to allow for review and renewal far enough out to reduce the compliance burden while providing some monitor of possible cumulative effects.

Doc Method: Streamlined Review (PA)

Streamlined Activity:

1. Preservation Maintenance and Repair of Historic Properties
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[X] Historical Landscape Architect

Name: Roberta Young

Date: 06/15/2020

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Streamlined Review (PA)

Streamlined Activity:

1. Preservation Maintenance and Repair of Historic Properties
 3. Repair/Resurfacing/Removal of Existing, Roads, Trails and Parking Areas
 5. Routine Grounds Maintenance
 11. Culvert Replacement
 14. Mechanical, Electrical and Plumbing Systems
-

[X] Regional Section 106 Coordinator

Name: Stephen Rogers

Date: 07/15/2020

Comments: This consensus determination is based upon a review of comments by all CRM Team members. When individual CRM Team member comments differ, this shall serve as the final determination of effect and consultation method. Park must adhere to any stipulations marked on the Mitigations page in PEPC.

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☒ No Adverse Effect ☐ Adverse Effect ☒ Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Streamlined Review (PA)

Streamlined Activity:

1. Preservation Maintenance and Repair of Historic Properties
 5. Routine Grounds Maintenance
 9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences
 14. Mechanical, Electrical and Plumbing Systems
-

No Reviews From: Anthropologist

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**1. Assessment of Effect:**

_____	No Potential to Cause Effects
_____	No Historic Properties Affected
<u> X </u>	No Adverse Effect
_____	Adverse Effect

2. Documentation Method:**[] A. Standard 36 CFR Part 800 Consultation**

Further consultation under 36 CFR Part 800 is needed.

[X] B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

Applicable Streamlined Review Criteria

(Specify 1-16 of the list of streamlined review criteria.)

1. Preservation Maintenance and Repair of Historic Properties.
5. Routine Grounds Maintenance.
9. Maintenance or Replacement of Non-Historic Utility Lines, Transmission Lines, and Fences.
14. Mechanical, Electrical and Plumbing Systems.

[] C. Undertaking Related to Park Specific or Another Agreement

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

[] D. Combined NEPA/NHPA Process

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

[] E. Memo to Project File**3. Consultation Information**

SHPO Required: No

SHPO Sent:

SHPO Received:

THPO Required: Yes

THPO Sent:

THPO Received:

SHPO/THPO Notes:

Advisory Council Participating: No

Advisory Council Notes:

Additional Consulting Parties: No

4. Stipulations and Conditions: Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

Park must adhere to any stipulations marked on the Mitigations page in PEPC.

5. Mitigations/Treatment Measures: Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

No Assessment of Effect mitigations identified.

6. Assessment of Effect Notes:

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Compliance Specialist:

NHPA Specialist

Kirby McCallie /s/ Kirby McCallie

Date: July 15, 2020

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Signature

Superintendent: _____

Date: _____